

Commonwealth of Kentucky
Division for Air Quality
EXECUTIVE SUMMARY

PROPOSED
TITLE V PERMIT NO. V-05-019 (REVISION 1)
GUARDIAN AUTOMOTIVE TRIM, INC.
MOREHEAD, KY.
12/18/2008
MARK LABHART REVIEWER
PLANT I.D. #: 021-205-00042
A.I. #: 3866
ACTIVITY ID #: APE20070002

SOURCE DESCRIPTION:

Operations at Guardian include spray coating of plastic parts with solvent-based coatings and decorative chrome electroplating of plastic parts. On February 4, 2008 the source submitted air dispersion and toxics modeling in accordance with permit V-05-019. In accordance with the previously approved protocol received in 2006, the U.S. Environmental Protection Agency (EPA) screening model SCREEN3 was applied to all Toxic Air Pollutants (TAPs), with refined modeling using the U.S. EPA's ISCST3 model to assess TAPs with the worst-case impacts. The modeling identified the potential for concern for the following TAPs: Chromium, Chromic Acid and Hydrazine.

Guardian Automotive complies with Subpart N by using a chemical fume suppressant. Specific language has now been added to the permit requiring the use of scrubbers in addition to the fume suppressant. Hydrazine is emitted from the neutralizer tank which is associated with the chrome pre-plating line. As a result of modeling, Guardian will now be required to control emissions from this tank with a packed bed scrubber.

In addition to the control equipment requirements, the applicable operating, monitoring, recordkeeping, and reporting requirements of 40 CFR 63, Subpart PPPP have been added to the permit.

PUBLIC AND AFFECTED STATE REVIEW:

On June 20, 2008 the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Morehead News* in Morehead, Kentucky. The public comment period expired 30 days from the date of publication. The Division also solicited comments on the draft permit during a public hearing at Morehead State University in Morehead, Kentucky on September 3, 2008 at 6:30 P. M. No states are affected by this permit action.

Comments were received from Robert Carl Ray on September 4, 2008 in response to the public hearing. Attachment B contains the comments received and the Division's response to each comment. No changes have been made to the permit. The permit is now being issued as proposed. A final permit will be issued after the U.S. EPA's 45-day review.